



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



310856

REPLY TO THE ATTENTION OF:

SE-5J

May 12, 2008

Steve Garbaciak, Jr. P.E.  
Vice-President  
ARCADIS – BBL Inc.  
30 West Monroe, Suite 1710  
Chicago, Illinois 60603-2404

Re: Modification to Former Plainwell Impoundment Area Time-Critical Removal Action Design Report to Require Changes to the Bank Soil PCB Concentration Confirmation Monitoring and Inclusion of Area 11B in the Removal Action

Dear Steve:

The purpose of this letter is to confirm that, pursuant to Paragraph 74 of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-863), U.S. EPA requires modifications to the Former Plainwell Impoundment Area Time-Critical Removal Action (TCRA) Design Report, dated February 2007 (Work Plan). The modifications include changes in the Bank Soil PCB Concentration Confirmation Monitoring presented in Section 5.4.3 of the Work Plan, and the inclusion of Area 11B in the TCRA.

The Work Plan currently defines the area of the bank to be monitored to include “varying widths of the bank that extend outward from the river and are bounded on the river side by the dam-in median water elevation, and on the landward side by the top of bank.” Areas within the bank below the dam-in median water elevation are not part of the current bank monitoring program. U.S. EPA, after consultation with the Michigan Department of Environmental Quality (MDEQ), is concerned that these areas could contain unacceptable levels of PCBs which could go undetected and unaddressed unless the Work Plan’s monitoring requirements are modified. Therefore, U.S. EPA has determined that the Work Plan should be modified to require Respondents to monitor these areas to verify that no unacceptable PCB concentrations exist in the bank areas. If these areas do contain PCBs at concentrations exceeding the performance standards of the TCRA, Respondents shall address them in the manner specified in the Work Plan. To accomplish this additional work, U.S. EPA requires Millennium Holdings, LLC and Georgia-Pacific, LLC (Kalamazoo River Study Group or KRSG) to modify their Bank Soil PCB Concentration Confirmation Monitoring to include “varying widths of the bank

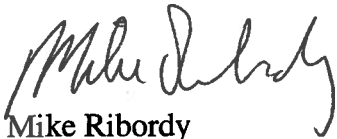
that extend outward from the river and are bounded on the river side by the toe of the slope of the near-shore removal, and on the landward side by the top of bank.”

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In addition, U.S. EPA and MDEQ have recently inspected Area 11B with ARCADIS representative E.J. Suardini and determined that access into this area is possible to conduct removal activities. This area was previously thought to be inaccessible and was not included in the Work Plan. Therefore, U.S. EPA requires Respondents to modify the Work Plan to incorporate Area 11B into the TCRA. U.S. EPA requests that within 20 days of receipt of this letter, the KRSG submit a proposal for conducting the removal work in Area 11B.

If you have any questions or concerns regarding this additional work, please do not hesitate to contact me at (312) 886-4592.

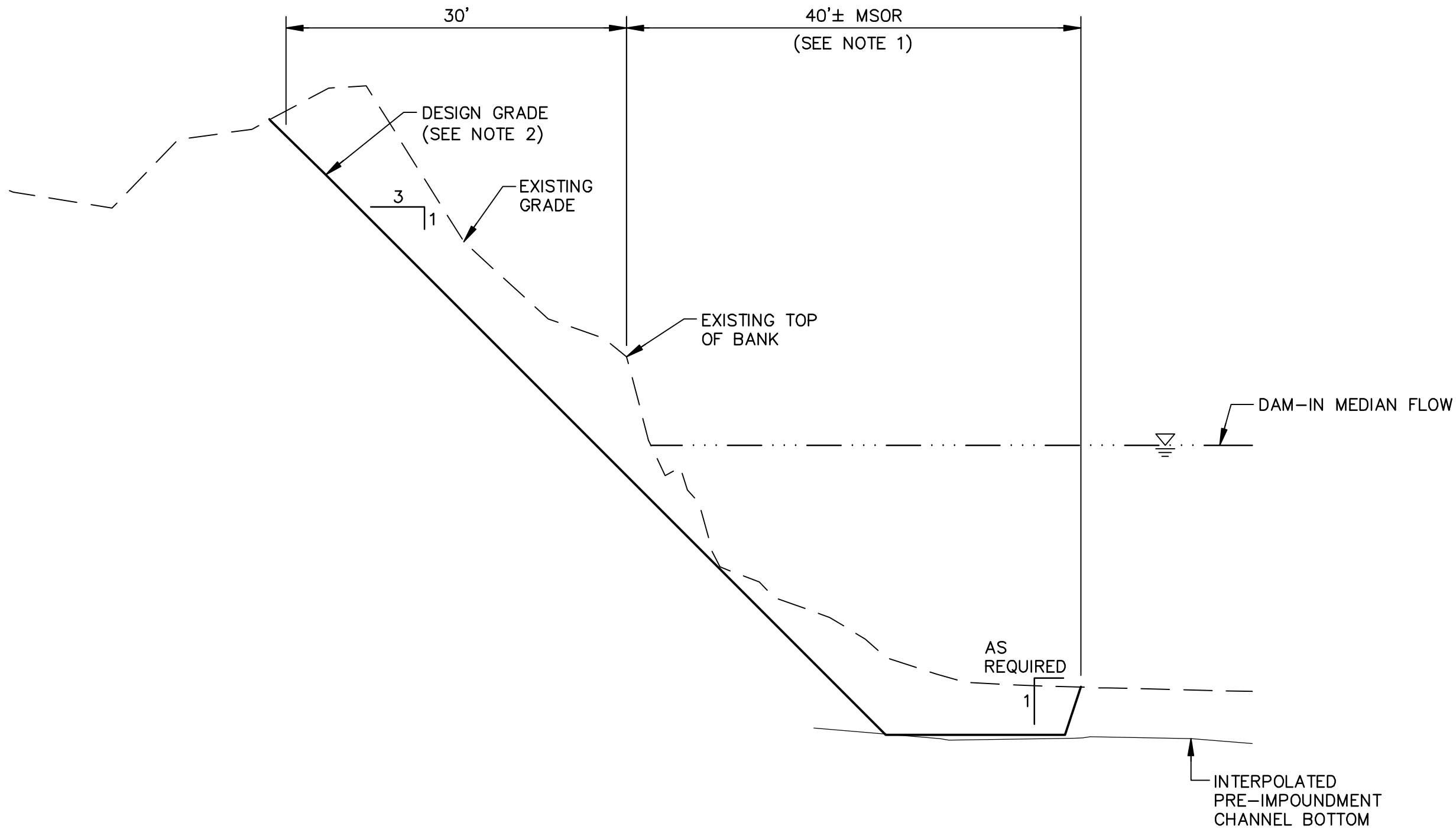
Sincerely,



Mike Ribordy  
On-Scene Coordinator

cc: Paul Buckholtz, MDEQ  
Jim Saric, USEPA  
Eileen Furey, USEPA  
Bonnie Barnett, Esq.  
Mellonie Fleming, Esq.

[SR-85-AGS] SR-85-AGS LAYER: ON=\* OFF=REF\* G:\CAD\ACT\B0064530\000\00676\DWG\TCRA-C\REV001\64530SR2\_5A.DWG  
G:\CAD\ACT\B0064530\000\00676\DWG\TCRA-C\REV001\64530SR2\_5A.DWG  
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REFS: 64530X00 SDGSTAMP.TIF  
PENTABLE:PLTCONT1.CTB PRINTED:6/4/2008 1:15 PM BY:ASAMOS  
LAYOUT:SR-2.5A PAGESETUP:-----  
SAVED:6/4/2008 1:15 PM



NOTES:

1. MSOR = MAXIMUM SAFE OPERATING REACH. SEE SECTION 2.1.1 OF THE TCRA DESIGN REPORT FOR ADDITIONAL INFORMATION.
2. REFER TO RESTORATION DRAWINGS R-1.1 THROUGH R-2.9 FOR FINAL GRADING REQUIREMENTS.

**TYPICAL REMOVAL SECTION**  
**SOUTH BANK - STATION 18+00 TO 20+00**

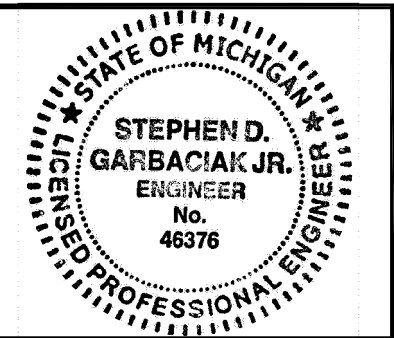
NOT TO SCALE  
(3X VERTICAL EXAGGERATION)

5A  
SR-1.2

ORIGINAL SCALE APPLIES TO 22"X34" DRAWING			
SCALE(S) AS INDICATED			
THIS DRAWING WAS PREPARED AT THE SCALE(S) INDICATED. INACCURACIES IN THE STATED SCALE(S) MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR(S) TO DETERMINE THE ACTUAL SCALE(S) OF THIS DRAWING.			

No.	Date	Revisions	Init
THIS DRAWING IS THE PROPERTY OF ARCADIS BBL AND MAY NOT BE REPRODUCED OR ALTERED IN WHOLE OR IN PART WITHOUT THE EXPRESS WRITTEN PERMISSION OF ARCADIS BBL.			

Professional Engineer's Name <b>STEPHEN GARBACIAK JR.</b>		
Professional Engineer's No. 6201046373		
State MICHIGAN	Date Signed	
Project Mgr. SDG	Designed by TAS	Drawn by AGS

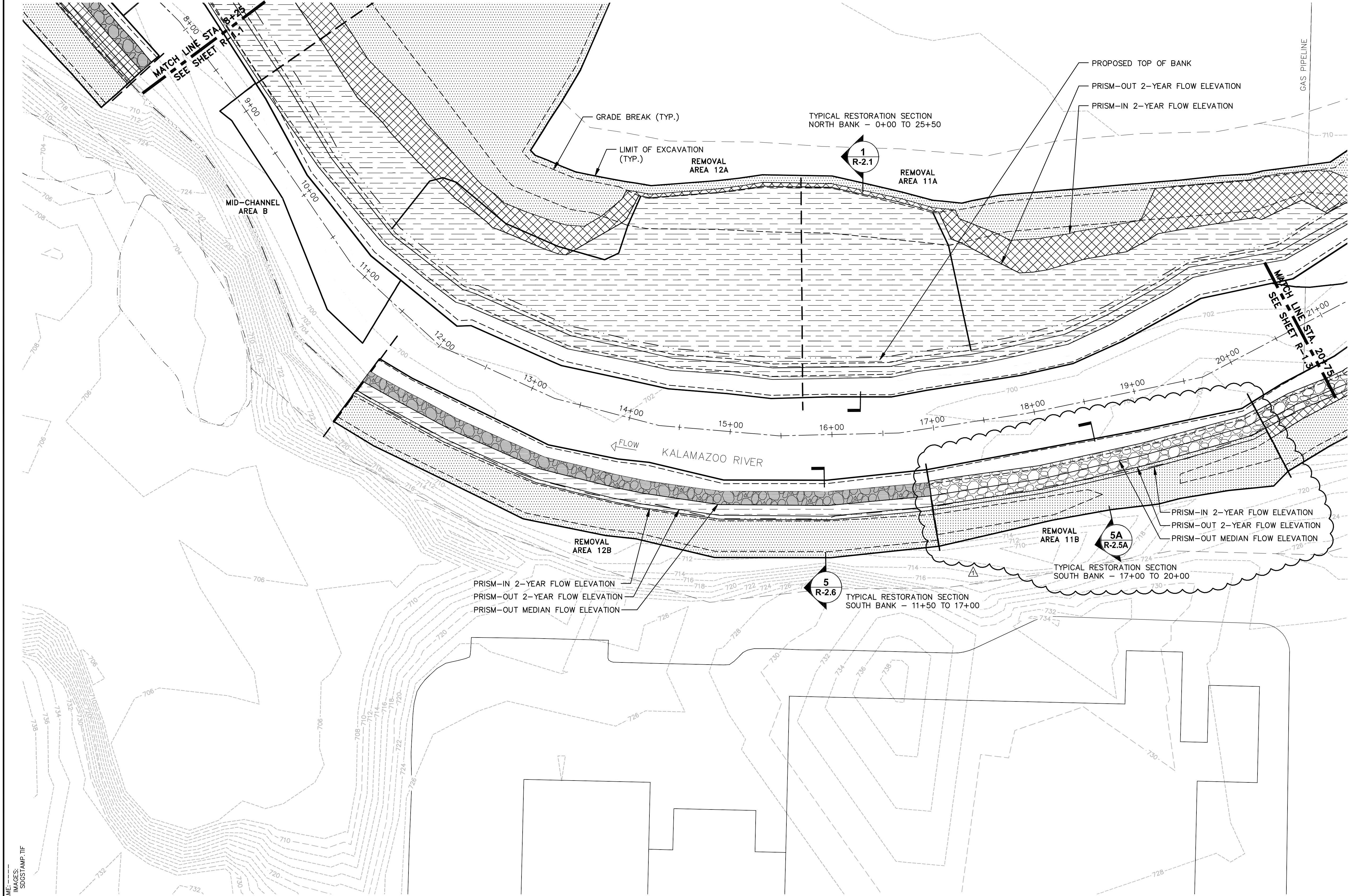


KALAMAZOO RIVER STUDY GROUP • ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE  
PLAINWELL TCRA DESIGN REPORT  
**TYPICAL REMOVAL SECTION**  
**SOUTH BANK (STA. 18+00 TO 20+00)**  
SEDIMENT REMOVAL

Project No. 64530.670
Date JUNE 2008
ARCADIS G&M of Michigan, LLC (formerly known as Blasland, Bouck & Lee, Inc.) 30 W. Monroe St., Suite 1710 Chicago, IL 60448-2404 312-332-4937

**SR-2.5A**

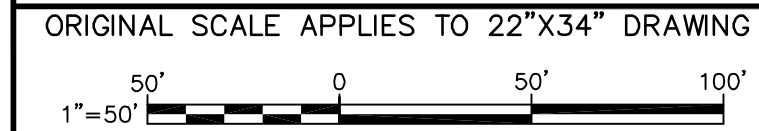
[SYR-85-BGP AGS LAYER: ON=\*, OFF=REF\*]  
G:\CAD\ACT\B0064530\000\00676\DWG\TCRA-C\REV001\64530R1.DWG    SAVED: 6/4/2008 1:01 PM    LAYOUT: R-1.2    PAGES: 1 OF 2    PENTABLE: PLTCONT1.CTB    PRINTED: 6/4/2008 1:05 PM    BY: ASAMIOS



FLOW ELEVATION TABLE			
STATION	PRISM-OUT MED	PRISM-OUT 2-YEAR	PRISM-IN 2-YEAR
9+00	700.6	703.6	705.1
10+00	700.7	703.7	705.3
11+00	700.9	704.2	705.4
12+00	701.1	704.4	705.6
13+00	701.2	704.5	705.7
14+00	701.3	704.6	705.9
15+00	701.4	704.7	706.0
16+00	701.5	704.8	706.1
17+00	701.6	704.9	706.2
18+00	701.7	705.0	706.4
19+00	701.8	705.1	706.5
20+00	701.9	705.3	706.6

- LEGEND:
- APPROX. LIMIT OF REMOVAL AREA
  - [Cross-hatch pattern] PLANTING ZONE 1
  - [Diagonal line pattern] PLANTING ZONE 2
  - [Dotted pattern] PLANTING ZONE 3
  - [Stippled pattern] RIVER RUN ROCK
  - [Rock pattern] RIVER RUN ROCK OR RUN OF BANK MATERIAL

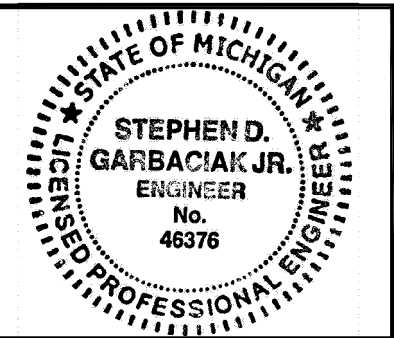
- NOTES:
- SEE DRAWING G-2.1 FOR BASEMAP INFORMATION.
  - SEE TYPICAL RESTORATION SECTION DRAWINGS R-2.1 THROUGH R-2.9 FOR DETAILED ROCK AND PLANTING ZONE LIMITS.
  - FLOW LIMITS SHOWN ON THIS DRAWING ARE APPROXIMATE. ACTUAL LIMITS SHALL BE DETERMINED VIA FIELD SURVEY BASED ON THE ACTUAL EXCAVATION ELEVATIONS ACHIEVED IN THE FIELD.



THIS DRAWING WAS PREPARED AT THE SCALE(S) INDICATED. INACCURACIES IN THE STATED SCALE(S) MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR(S) TO DETERMINE THE ACTUAL SCALE(S) OF THIS DRAWING.

No.	Date	Revisions	Init
1	06/04/08	ADDED REMOVAL AREA 11B	

Professional Engineer's Name <b>STEPHEN GARBACIAK JR.</b>	
Professional Engineer's No. 6201046373	
State MICHIGAN	Date Signed
Project Mgr. SDG	Designed by ANE
	Drawn by BGP



KALAMAZOO RIVER STUDY GROUP • ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE  
PLAINWELL TCRA DESIGN REPORT

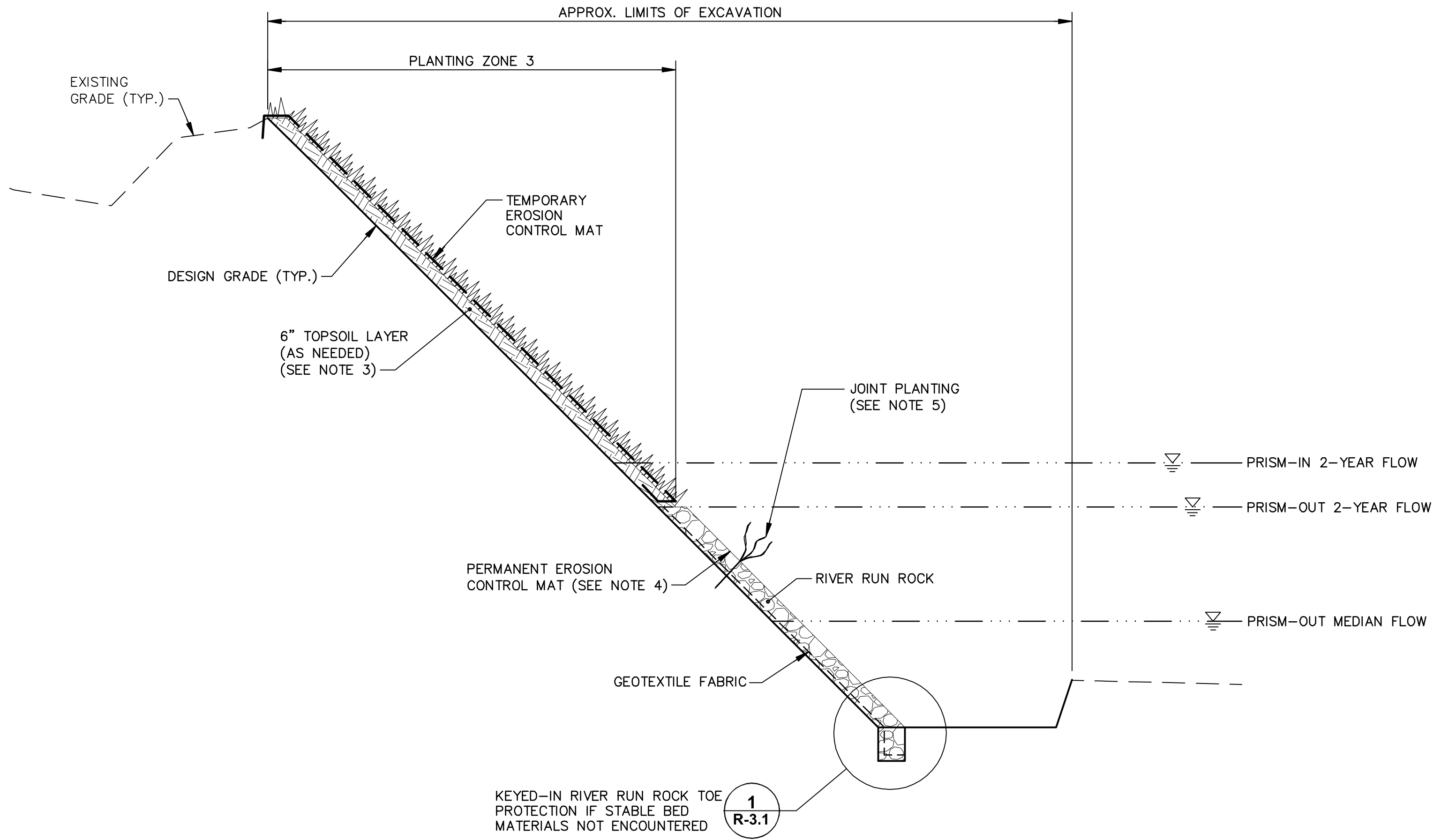
## RESTORATION PLAN (8+25 TO 20+75)

BANK AND FLOODPLAIN RESTORATION

Project No. 64530.670
Date FEBRUARY 2007
ARCADIS G&M of Michigan, LLC (formerly known as Blasland, Bouck & Lee, Inc.) 30 W. Monroe St., Suite 1710 Chicago, IL 60448-2404 312-332-4937

R-1.2

[SYR-85-AGS] SYR-85-BGP AGS LAYER: ON=\*, OFF=REF\*  
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PROJECT NAME: 64530X00 SDGSTAMP.TIF  
REFS: IMAGES:



**TYPICAL RESTORATION SECTION**  
**SOUTH BANK - 17+00 TO 20+00**

NOT TO SCALE  
(3X VERTICAL EXAGGERATION)

5A  
R-1.2

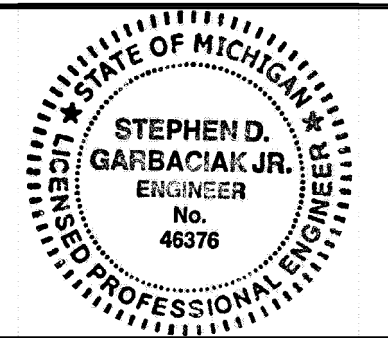
NOTES:

- SEE DRAWINGS G-6.1 AND G-6.2 FOR RESTORATION MATERIALS AND PLANTING SPECIFICATIONS.
- SEE RESTORATION PLAN DRAWINGS R-1.1 THROUGH R-1.8 FOR FLOW ELEVATIONS.
- IF SOILS ENCOUNTERED AT DESIGN GRADE EXHIBIT CHARACTERISTICS THAT WOULD NOT SUPPORT VEGETATIVE GROWTH, SUCH SOILS SHALL BE AMENDED WITH 6 INCHES OF TOPSOIL PRIOR TO SEEDING/PLANTING (SEE DRAWING G-6.1).
- LIVE WILLOW STAKES WILL BE INSERTED INTO ROCK AND THROUGH GEOTEXTILE INTO UNDERLYING SOIL IN TWO ROWS AT 5-FOOT SPACING ON-CENTER PER B.8 ON DRAWING G-6.1.

ORIGINAL SCALE APPLIES TO 22"X34" DRAWING			
SCALE(S) AS INDICATED			
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Professional Engineer's No. 6201046373		
State MICHIGAN	Date Signed	
Project Mgr. SDG	Designed by ANE	Drawn by BGP



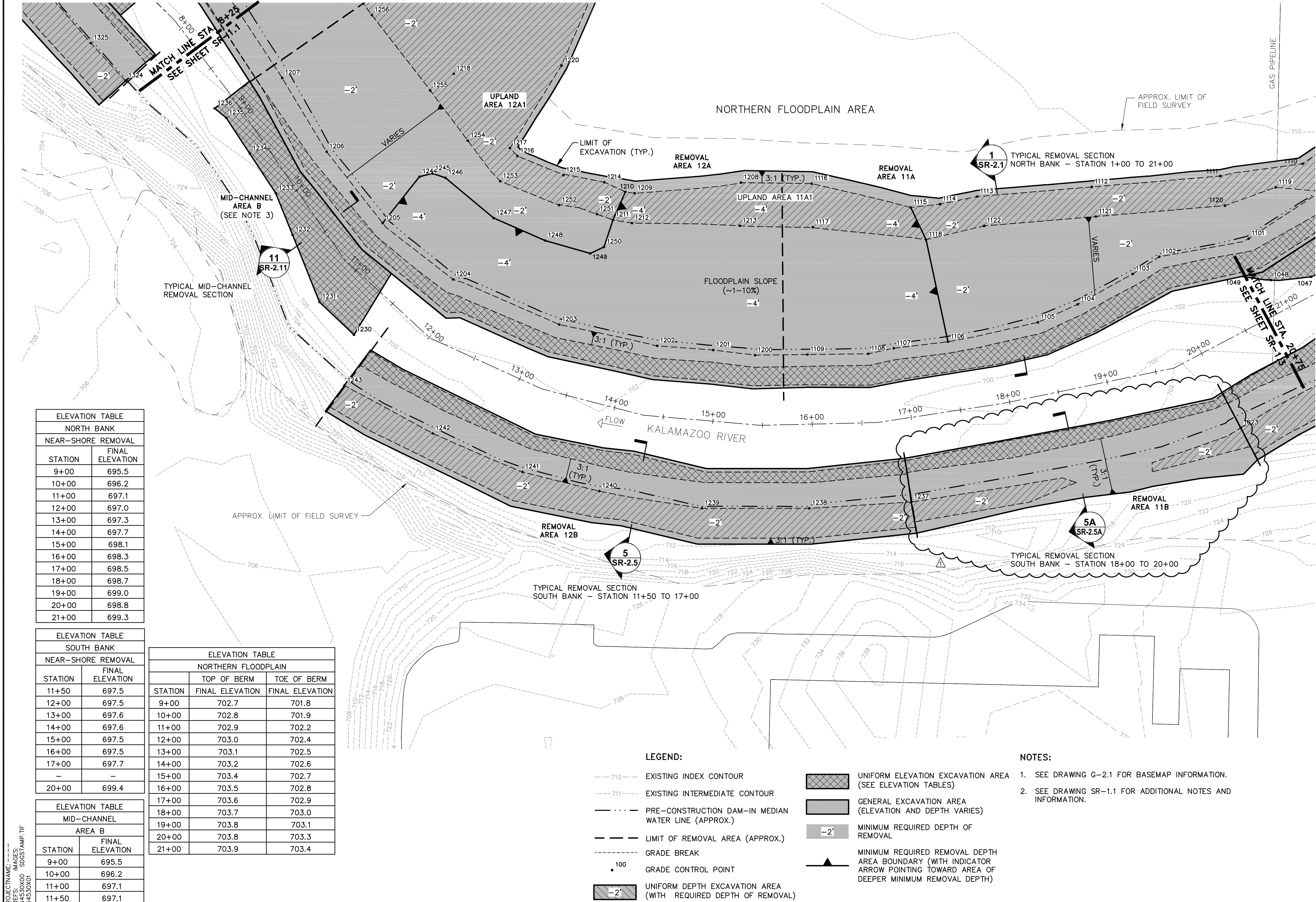
KALAMAZOO RIVER STUDY GROUP • ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE  
PLAINWELL TCRA DESIGN REPORT  
**TYPICAL RESTORATION SECTION**  
**SOUTH BANK (17+00 TO 20+00)**  
BANK AND FLOODPLAIN RESTORATION

Project No. 64530.670
Date JUNE 2008
ARCADIS G&M of Michigan, LLC (formerly known as Blasland, Bouck & Lee, Inc.) 30 W. Monroe St., Suite 1710 Chicago, IL 60448-2404 312-332-4937

**R-  
2.5A**



[SYR-85-AGS] SYR-85-AGS LAYER: ON=\*, OFF=\*,REF\*  
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ELEVATION TABLE	
NORTH BANK	
NEAR-SHORE REMOVAL	
STATION	FINAL ELEVATION
9+00	695.5
10+00	696.2
11+00	697.1
12+00	697.0
13+00	697.3
14+00	697.7
15+00	698.1
16+00	698.3
17+00	698.5
18+00	698.7
19+00	699.0
20+00	698.8
21+00	699.3

ELEVATION TABLE	
SOUTH BANK	
NEAR-SHORE REMOVAL	
STATION	FINAL ELEVATION
11+50	697.5
12+00	697.5
13+00	697.6
14+00	697.6
15+00	697.5
16+00	697.5
17+00	697.7
20+00	699.4

ELEVATION TABLE	
MID-CHANNEL AREA B	
STATION	FINAL ELEVATION
9+00	695.5
10+00	696.2
11+00	697.1
11+50	697.1

ELEVATION TABLE			
NORTHERN FLOODPLAIN			
	TOP OF BERM	TOE OF BERM	
STATION	FINAL ELEVATION	FINAL ELEVATION	
9+00	702.7	701.8	
10+00	702.8	701.9	
11+00	702.9	702.2	
12+00	703.0	702.4	
13+00	703.1	702.5	
14+00	703.2	702.6	
15+00	703.4	702.7	
16+00	703.5	702.8	
17+00	703.6	702.9	
18+00	703.7	703.0	
19+00	703.8	703.1	
20+00	703.8	703.3	
21+00	703.9	703.4	

LEGEND:

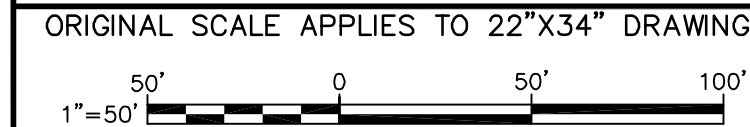
- 710 --- EXISTING INDEX CONTOUR
- 711 --- EXISTING INTERMEDIATE CONTOUR
- PRE-CONSTRUCTION DAM-IN MEDIAN WATER LINE (APPROX.)
- LIMIT OF REMOVAL AREA (APPROX.)
- GRADE BREAK
- 100 GRADE CONTROL POINT
- 2' --- UNIFORM DEPTH EXCAVATION AREA (WITH REQUIRED DEPTH OF REMOVAL)

- UNIFORM ELEVATION EXCAVATION AREA (SEE ELEVATION TABLES)
- GENERAL EXCAVATION AREA (ELEVATION AND DEPTH VARIES)
- MINIMUM REQUIRED DEPTH OF REMOVAL
- MINIMUM REQUIRED REMOVAL DEPTH AREA BOUNDARY (WITH INDICATOR ARROW POINTING TOWARD AREA OF DEEPER MINIMUM REMOVAL DEPTH)

NOTES:

- SEE DRAWING G-2.1 FOR BASEMAP INFORMATION.
- SEE DRAWING SR-1.1 FOR ADDITIONAL NOTES AND INFORMATION.

GRADE CONTROL TABLE		
PT. NO.	NORTHING	EASTING
1023	349909.5	12773551.5
1049	350062.1	12773554.7
1101	350099.7	12773559.5
1102	350081.5	12773469.6
1103	350064.2	12773442.9
1104	350033.7	12773387.7
1105	350015.6	12773347.8
1106	349996.0	12773257.2
1107	349989.5	12773202.8
1108	349983.9	12773177.2
1109	349983.2	12773116.1
1110	350175.0	12773613.7
1111	350162.6	12773531.1
1112	350151.7	12773401.9
1113	350142.0	12773286.7
1114	350134.4	12773249.2
1115	350131.0	12773219.9
1116	350155.0	12773120.3
1117	350111.2	12773121.4
1118	350098.6	12773235.2
1119	350151.3	12773586.6
1120	350132.9	12773535.7
1121	350121.9	12773405.9
1122	350112.5	12773293.6
1200	349982.5	12773063.3
1201	349987.7	12773021.5
1202	349991.9	12772965.1
1203	350013.3	12772866.7
1204	350058.7	12772760.1
1205	350115.3	12772689.2
1206	350187.1	12772632.9
1207	350261.2	12772588.3
1208	350156.1	12773049.3
1209	350145.3	12772942.5
1210	350146.8	12772933.2
1211	350118.5	12772920.7
1212	350115.3	12772939.8
1213	350112.6	12773048.1
1214	350156.4	12772912.0
1215	350163.5	12772870.8
1216	350182.7	12772824.7
1217	350190.8	12772817.1
1218	350265.4	12772760.6
1220	350273.7	12772868.9
1230	350003.0	12772660.4
1231	350036.0	12772625.7
1232	350103.5	12772598.6
1233	350145.2	12772581.9
1234	350185.1	12772555.7
1235	350221.2	12772532.0
1236	350230.6	12772520.4
1237	349834.9	12773220.4
1238	349828.6	12773118.0
1239	349828.6	12773010.0
1240	349845.9	12772906.9
1241	349865.1	12772829.7
1242	349903.9	12772739.5
1243	349952.0	12772650.8
1244	350162.0	12772726.3
1245	350165.2	12772739.2
1246	350160.8	12772752.3
1247	350120.4	12772800.7
1248	350097.8	12772852.4
1249	350084.8	12772897.8
1250	350091.3	12772911.6
1251	350124.3	12772904.6
1252	350133.4	12772866.5
1253	350157.4	12772807.3
1254	350198.3	12772774.6
1255	350248.5	12772737.0



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No.	Date	Revisions	Init
1	06/04/08	ADDED REMOVAL AREA 11B	

Professional Engineer's Name  
**STEPHEN GARBACIAK JR.**  
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MICHIGAN  
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Project Mgr.  
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Designed by  
TAS  
Drawn by  
AGS



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PLAINWELL TCRA DESIGN REPORT  
**SEDIMENT REMOVAL PLAN (8+25 TO 20+75)**  
SEDIMENT REMOVAL

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**SR-1.2**